

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)

RUSSIAN RESEARCH CENTER
THE KURCHATOV INSTITUTE,

Plaintiff,

v.

WESTERN SERVICES CORP., et al.,

Defendants and
Third Party Plaintiff,

v.

GSE SYSTEMS, INC.

Third Party
Defendants.

Civil Action No.:

AMD 02-3878

**GSE'S MOTION TO COMPEL PRODUCTION
OF DOCUMENTS BY WSC IN RESPONSE TO GSE'S SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS**

Third Party Defendant, GSE Systems, Inc., by and through its attorneys, moves to compel Third Party Plaintiff WSC to produce all documents requested by GSE in GSE's Second Request for Production of Documents, and says as follows:

1. WSC has unilaterally decided and announced to GSE that WSC will not produce all and every discoverable document that GSE has requested. Instead, WSC has stated that it will choose which discoverable documents it will produce. Furthermore, WSC has not disclosed and identified the documents that are being withheld on the basis of its refusal to produce all and

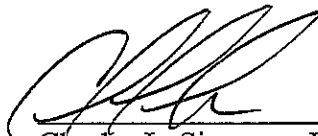
every document requested.

2. WSC's responses are incomplete and/or not fully responsive to GSE's Second Request for Production of Documents.

3. WSC's responses assert one or more privileges not applicable to the documents sought by GSE.

4. WSC's responses asserting "any other applicable privilege" are vague and improper. GSE is entitled to know specifically any privileges upon which WSC is relying in withholding documents from disclosure, identification, and production.

5. This Motion To Compel is supported by a Memorandum which sets forth each GSE request at issue, WSC's objections and responses, and the reasons for GSE's motion to compel.



Charles L. Simmons Jr. P.C.

Federal Bar No. 024278

Francis J. Gorman, P.C.

Federal Bar No. 00069

Michael S. Yang

Federal Bar No. 025951

GORMAN & WILLIAMS

Two North Charles Street

Baltimore, Maryland 21201

410-528-0600

410-528-0602 (facsimile)

Attorneys for Third Party

Defendant GSE Systems, Inc.

CERTIFICATE OF SERVICE

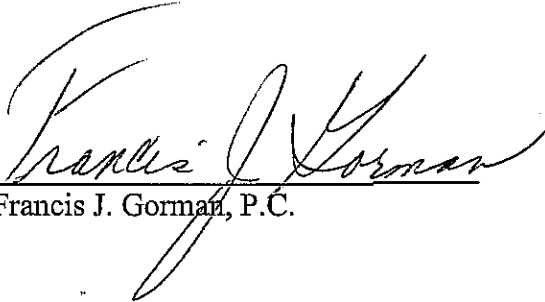
I HEREBY CERTIFY that on the 1st day of October, 2003, a copy of the foregoing GSE Systems, Inc.'s Motion to Compel Production By WSC In Response To GSE's

Second Request For Production Of Documents was served by first-class mail, postage prepaid,
on:

Bruce R. Genderson, Esq.
Margaret A. Keeley, Esq.
Ann Sagerson, Esq.
Williams & Connolly, LLP
725 Twelfth Street, N.W.
Washington, D.C. 20005
(202) 434-5000
Counsel for Western Services
Corporation and George Utmel

and

John M.G. Murphy, Esq.
E. Scott Johnson, Esq.
Ober, Kaler, Grimes & Shriver, P.C.
120 East Baltimore Street
Baltimore, MD 21202
(410) 685-1120
Counsel for Russian Research Center
The Kurchatov Institute



Francis J. Gorman, P.C.